

Commercial Roofing Systems

CRS of Kentucky 3621 Burning Tree Ln • Lexington, KY 40509

December 11, 2012

Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: DA 12-1863, IB Docket No. 12-340; RM-11683

Dear Federal Communications Commission:

Wireless innovation is increasingly becoming the lifeblood of the American economy. I urge the Commission to enable all Americans to be able to benefit from the type of technology that is one of the very few growth drivers for our economy by approving the pending application for license modification filed by LightSquared, a Virginia-based company that proposes to implement a revolutionary new 4G cellular telephone and wireless broadband network utilizing both satellite and terrestrial resources.

I am the owner of Commercial Roofing Systems of KY a construction supply company which operates in Kentucky and its surrounding states. The operation of my business, which requires the delivery of construction materials and supplies over a multi-state area, requires constant communications between sales people, delivery people, and our office staff. Throughout much of rural Kentucky, it is difficult, if not impossible, to make a simple cell phone call, and there is little or no service at even the 2G level, much less 3G, in many of these areas.

This state of affairs has held back the economic development in much of rural Kentucky, because companies like mine must locate in areas which have decent telecommunications services, and few businesses are either willing or able to expand their operations in markets without good wireless communications.

I understand that the Commission undertakes some of the most complex challenges in government – a seemingly tightrope balancing act juggling policy, politics, science, many multifaceted industry players, and the public interest.

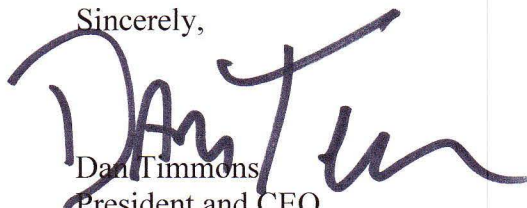
It seems to me that LightSquared's proposed giving up of a portion of the bandwidth spectrum that it owns, in exchange for the ability to share a smaller portion of the bandwidth with a Federal agency in another portion of the spectrum, is a win win situation for America, because it allows us to have the benefits of LightSquared's 4G service, with no danger to the GPS industry's spectrum.

I'm also mindful of the fact that spectrum sharing between federal and commercial users is an absolutely necessary policy tool to achieve the Commission's goal to efficiently and effectively manage spectrum in a manner that allows all Americans to have affordable access to robust and reliable wireless broadband products and services. With this in mind, the Commission should approve of LightSquared's request to modify its license so it can provide a nationwide wireless broadband service using spectrum shared with federal users. In its filing, the company states unequivocally that it will use the relevant shared spectrum "in a manner that will protect the integrity of continuing, essential government operations." Moreover, the Commission should weigh the fact that LightSquared is in a unique position to leverage this shared spectrum into a significant wireless broadband network because it is already authorized to use an adjacent 5 MHz block of frequencies.

Using government subsidies or grants, LightSquared is committed to investing significant capital in building a new wireless competitor using shared spectrum. It is imperative that the Commission take advantage when an applicant like LightSquared, which has the assets to build such a system, comes to the table. According to recent studies by the Telecommunications Industry Association and others, every \$10 billion capital investment in wireless infrastructure creates 100,000 American jobs – notwithstanding the positive spillover effects additional spectrum capacity will have on the provision of healthcare, education and business connectivity. If the Commission fails to grant LightSquared's application to get more spectrum into the marketplace, the Commission will be remiss in giving up opportunities for new jobs and growth.

Thank you for your time and consideration on this matter, and I urge you to approve LightSquared's pending application.

Sincerely,



Dan Timmons
President and CEO
CRS of Kentucky